

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Prashant Kolluri (312) 886-9085

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**FILED****JUN 05 2020****MAGISTRATE JUDGE
GABRIELA A. FUENTES**

UNITED STATES OF AMERICA

v.

PARIS MICKLE and
TAHKISHA HODGE

CASE NUMBER: 20 CR 280

UNDER SEAL**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about June 2, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, the defendants violated:

Code Section

Title 18, United States Code, Section 371

Offense Description

conspired with each other, and with others unknown, to commit an offense against the United States, namely, bank theft, in violation of Title 18, United States Code, Section 2113(b).

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

WARD P. YODER

Special Agent, Federal Bureau of Investigation
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: June 5, 2020*Judge's signature*City and state: Chicago, IllinoisGABRIEL A. FUENTES, U.S. Magistrate Judge*Printed name and title*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, WARD P. YODER, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation, and have been so employed for approximately 11 years. My current responsibilities include the investigation of violent crimes, including, among others, kidnapping, bank robbery, and the apprehension of violent fugitives.

2. This affidavit is submitted in support of a criminal complaint alleging that PARIS MICKLE and TAHKISHA HODGE have conspired with each other, and with others unknown, to commit bank theft, in violation of Title 18, United States Code, Section 2113(b), all in violation of Title 18, United States Code, Section 371.

3. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging MICKLE and HODGE with conspiracy, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendants committed the offense alleged in the complaint.

4. The information set forth in this affidavit is based on multiple sources, including but not limited to, my personal knowledge, my review of documents and reports related to this investigation, witness interviews, my review of surveillance

video recordings related to this investigation, and information conveyed to me by other local and federal law enforcement officers.

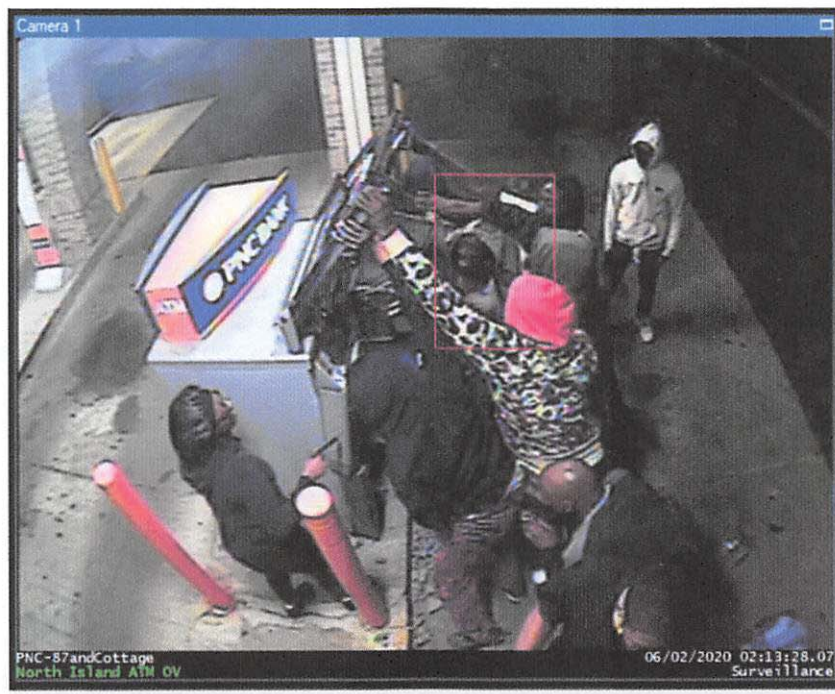
The June 2, 2020 Attempted Theft of the PNC Bank ATM

5. On or about June 2, 2020, beginning at approximately 1:50 a.m., a group of individuals attempted to steal U.S. currency located in the drive-through PNC Bank ATM located at 8700 South Cottage Grove Avenue, Chicago, Illinois (the “PNC Bank ATM”). MICKLE and HODGE were later identified through the investigation described below as two of the individuals conspiring with each other, and with others unknown, to break into the ATM in order to take and carry away money belonging to, or in the care, custody, control, management, or possession of PNC Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation (“FDIC”), in violation of Title 18, United States Code, Section 2113(b).

6. Below is a Google Maps image of the PNC Bank ATM:



7. The PNC Bank ATM and associated PNC Bank building were equipped with surveillance video on June 2, 2020, which law enforcement has obtained and I have reviewed. That video shows multiple individuals surrounding the PNC Bank ATM starting at approximately 1:50 a.m. on June 2, 2020. In particular, at approximately 2:05 a.m., an individual with long dreadlocks, a gray hooded sweatshirt, and light-colored jeans, who is later identified as MICKLE, entered the area of the PNC Bank ATM. At approximately 2:13 a.m., an individual with a black hooded sweatshirt, black glasses, black head covering, and black pants, who is later identified as HODGE, entered the area of the PNC Bank ATM. Below are still images taken from the surveillance video footage showing MICKLE and HODGE (both outlined in red squares), along with other individuals, at the PNC Bank ATM at approximately 2:13 a.m. on or about June 2, 2020.





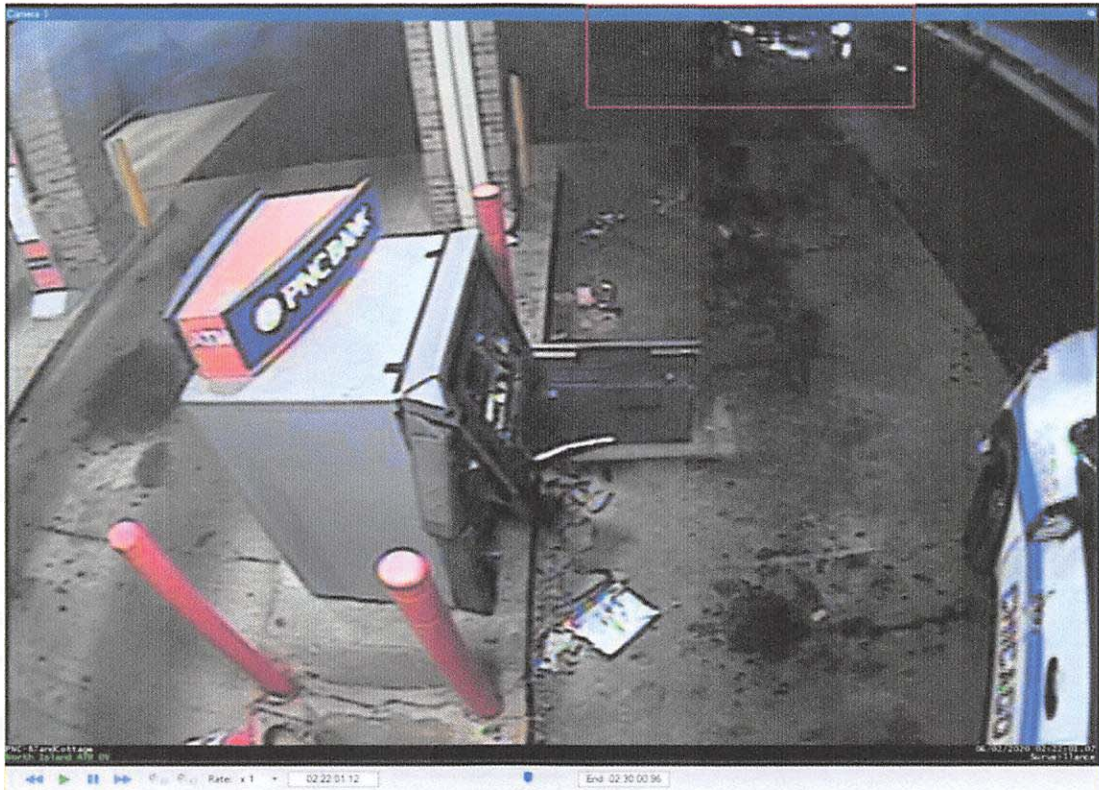
8. Over the next approximately 10 minutes, MICKLE and HODGE conspired with each other, and with others unknown, to forcibly remove the PNC Bank ATM from its enclosure and attempt to steal the cash inside the ATM. In furtherance of, and to effect the object of, the conspiracy, MICKLE and HODGE committed and caused overt acts as described below.

9. The ATM and bank surveillance video captures individuals in the group working together attempting to access the U.S. currency in the PNC Bank ATM. The video captures MICKLE using a blue blow torch to try to gain access to the ATM. Below is a still image taken from the surveillance video footage showing MICKLE with the blow torch.



10. The bank surveillance video footage later shows a black Ford SUV, which was being driven by HODGE, with a chain connected to the rear of the vehicle. The video footage further shows that MICKLE and other individuals worked together to attach the chain from the rear of the vehicle to the PNC Bank ATM in an attempt to gain access to the ATM by having the vehicle then drive off.

11. The video footage then shows the Ford SUV backing away from a responding Chicago Police Department ("CPD") vehicle at approximately 2:22 a.m., as depicted in the below image.



MICKLE and HODGE are Arrested by CPD

12. According to police reports, CPD officers were responding to a call of a person with a gun at or around the PNC Bank ATM when they observed the black Ford SUV used in the attempted theft of the PNC Bank ATM backing away from the responding CPD car, with the chain still attached to the vehicle.

13. According to police reports, when the CPD officers arrived on the scene, they observed MICKLE walking southbound from the PNC Bank ATM. CPD officers attempted to make a street stop of MICKLE at approximately 8734 South Cottage Avenue, Chicago, Illinois, and requested that MICKLE identify himself. According to the reports, MICKLE responded "Hell no, you ain't catching me," and fled. The police reports state that MICKLE was apprehended a short while later in the

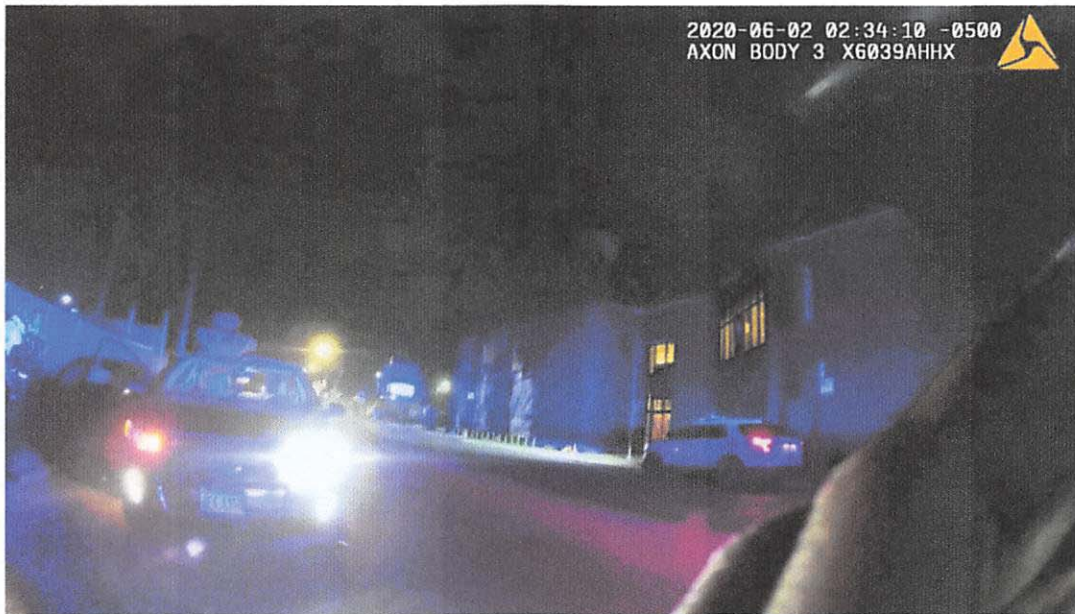
backyard of a residence located at 738 East 88th Street, Chicago, Illinois. MICKLE was then taken to a local police station for further processing.

14. According to police reports, when CPD officers arrived on the scene, they saw HODGE driving a black Ford Edge SUV with Illinois license plate number AF61155. The police reports state that when HODGE realized that CPD officers had seen her, she fled westbound in the vehicle while unsuccessfully attempting to drag the PNC Bank ATM using a chain with a hook that was connected to the vehicle. CPD officers apprehended HODGE moments later after a short car chase. CPD officers searched the vehicle and found a torch, a pry bar, and a chain with a hook attached to the rear of the vehicle.

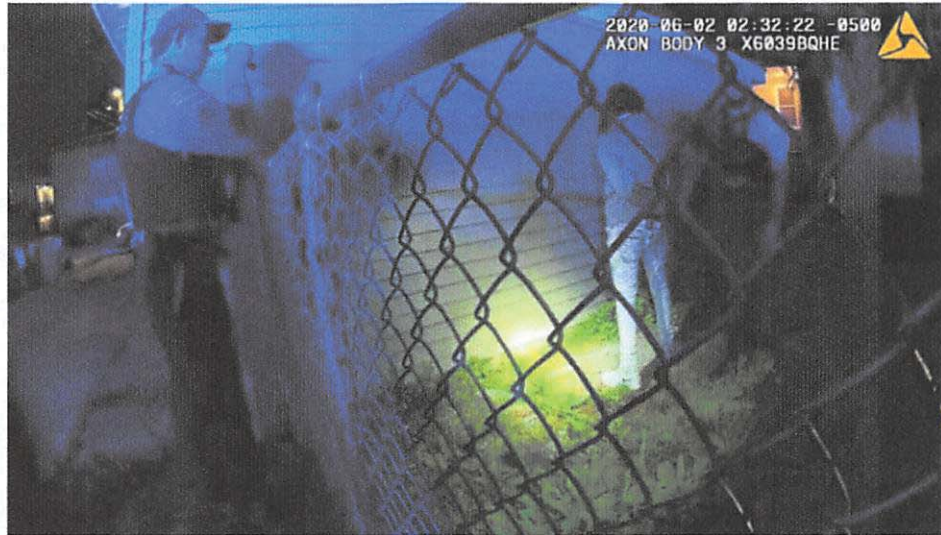
15. The following still image from CPD body-worn camera footage that I have reviewed shows HODGE immediately following her arrest. In both the below image of HODGE and the bank video surveillance footage, HODGE is wearing a black sweatshirt, black pants, black glasses, and a black head covering.



16. The following still image from CPD body-worn camera footage that I have reviewed shows the black Ford SUV that HODGE was driving at the time of her arrest. In both the below image and the bank video surveillance footage, the vehicle is depicted as a black Ford SUV.



17. The following still images from CPD body-worn camera footage that I have reviewed show MICKLE following his arrest. In both the below images of MICKLE and the bank video surveillance footage, MICKLE is wearing a gray hooded sweatshirt, light-colored jeans, and has long dreadlocks.



18. Based on my review of the PNC Bank surveillance video footage and the available CPD body-worn camera footage, I believe the distinctive clothing and overall physical appearance of MICKLE and HODGE are consistent with the distinctive clothing and overall physical appearance of two individuals involved in various capacities in attempting to access the PNC Bank ATM.

MICKLE is Interviewed by CPD

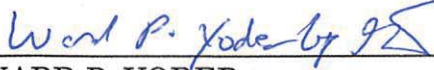
19. After MICKLE was read his *Miranda* rights, MICKLE was interviewed

by law enforcement. I have spoken to the law enforcement officer who interviewed MICKLE, and that interview was also audio and video recorded. When questioned about the attempted theft of the PNC Bank ATM, MICKLE indicated in effect that he used a tool in an attempt to open the ATM and was subsequently arrested down the street.

Conclusion

20. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that, on or about June 2, 2020, PARIS MICKLE and TAHKISHA HODGE conspired with each other, and with others unknown, to take and carry away money belonging to, or in the care, custody, control, management, or possession of PNC Bank, 8700 South Cottage Grove Avenue, Chicago, Illinois, the deposits of which were then insured by the FDIC, in violation of Title 18, United States Code, Section 2113(b), all in violation of Title 18, United States Code, Section 371.

FURTHER AFFIANT SAYETH NOT.


WARD P. YODER
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to telephonically
this 5th day of June, 2020


Honorable GABRIEL A. FUENTES
United States Magistrate Judge